

MULLIN HOARD & BROWN, L.L.P.

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*Motors, LP; Reagor-Dykes Imports, LP;*

*Reagor-Dykes Amarillo, LP; Reagor-Dykes*

*Auto Company, LP; Reagor-Dykes*

*Plainview, LP; Reagor-Dykes Floydada, LP*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

<b>IN RE:</b>	§	
	§	
<b>REAGOR-DYKES MOTORS, LP</b>	§	<b>Case No. 18-50214-rlj11</b>
<b>Debtor.</b>	§	
<b>IN RE:</b>	§	
	§	<b>Case No. 18-50215-rlj11</b>
<b>REAGOR-DYKES IMPORTS, LP</b>	§	<b>(Jointly Administered Under</b>
<b>Debtor.</b>	§	<b>Case No. 18-50214)</b>
<b>IN RE:</b>	§	
	§	<b>Case No. 18-50216-rlj11</b>
<b>REAGOR-DYKES AMARILLO, LP</b>	§	<b>(Jointly Administered Under</b>
<b>Debtor.</b>	§	<b>Case No. 18-50214)</b>
<b>IN RE:</b>	§	
	§	<b>Case No. 18-50216-rlj11</b>
<b>REAGOR-DYKES AUTO COMPANY, LP</b>	§	<b>(Jointly Administered Under</b>
<b>Debtor.</b>	§	<b>Case No. 18-50214)</b>
<b>IN RE:</b>	§	
	§	<b>Case No. 18-50218-rlj11</b>
<b>REAGOR-DYKES PLAINVIEW, LP</b>	§	<b>(Jointly Administered Under</b>
<b>Debtor.</b>	§	<b>Case No. 18-50214)</b>
<b>IN RE:</b>	§	
	§	<b>Case No. 18-50219-rlj11</b>
<b>REAGOR-DYKES FLOYDADA, LP</b>	§	<b>(Jointly Administered Under</b>
<b>Debtor.</b>	§	<b>Case No. 18-50214)</b>

**SECOND AMENDED WITNESS AND EXHIBIT LIST OF DEBTORS FOR  
HEARINGS SCHEDULED FOR AUGUST 16, 2018**

NOW COME, Reagor-Dykes Motors, LP, Reagor-Dykes Imports, LP, Reagor-Dykes Amarillo, LP, Reagor-Dykes Auto Company, LP, Reagor-Dykes Plainview, LP, and Reagor-Dykes Floydada, LP (each a “Debtor,” and collectively, the “Debtors”), the Debtors in the above-referenced bankruptcy proceedings, and files this Second Amended Witness & Exhibit List For Hearing Scheduled for August 16, 2018.

### **WITNESSES**

Debtors disclose that they may call the following individuals to provide testimony:

1. Timothy Conner, CPA, Accounting Manager
2. Brad Fansler, Administration Director
3. Lyndon James, Senior Partner, BlackBriar Advisors, LLC
4. Bob Schleizer, Managing Partner, BlackBriar Advisors, LLC
5. Bart Reagor, Owner
6. Rick Dykes, Owner
7. Steve Reinhart, Legal/Compliance Director, Facilities Director, New Construction Manager
8. Kerry Hernandez, Human Resources
9. Patrick Rielly, Lane, Cormann, Trubitt, CPA
10. Gary Byrd, Jr., Dallas Regional Manager, Ford Motor Credit Company (live or by deposition testimony)

Debtors reserve the right to amend this Witness List and to call other witnesses as may be necessary for rebuttal or impeachment purposes. Debtors also reserve the right to call any witnesses designated or called by any other party to these proceedings.

### **EXHIBITS**

Debtors disclose that they may introduce the following exhibits:

<b>TAB</b>	<b>DESCRIPTION</b>
1.	Cash flow Projections (A 30-day sources and uses of funds budget for the RDAG locations financed by FMCC)
2.	Copies of existing insurance policies for vehicles, furniture, fixtures and equipment, etc.

TAB	DESCRIPTION
3.	A listing of all vehicles in inventory across the RDAG and an analysis of which lender holds the lien against each vehicle along with vehicles involving contested liens
4.	A listing of vehicles that have not been floor planned, but may be subject to a floor-plan lender's lien against all inventory
5.	A listing of unpaid contracts in transit that reflect the name of the customer, the name of the lienholder to be paid-off and the amount of the pay-off
6.	Email from Gwen Schmucker dated June 29, 2018 forwarding June 28, 2018 Group Audit Summary from Ford Motor Credit
7.	Chart of SOT's for last eight (8) audits
8.	Copy of Registration Data Report (RDR) – Audit from Trigger Reporting Enhancement.
9.	Listing of customers and amounts owing for tax titles and license.
10.	Listing of payoffs on trade-ins
11.	FMCC Audit 6/28/19 Summary
12.	Liquidity Schedule
13.	a. Reagor-Dykes Deficit Analysis b. Reagor-Dykes Vehicle Receivables c. Reagor-Dykes Touched Unfloored Inventory

Debtors reserve the right to amend this Exhibit List in order to supplement the list of documents that may be introduced. Debtors also reserve the right to introduce other exhibits as may be necessary for impeachment purposes. Debtors also reserve the right to introduce exhibits designated by any other party to these proceedings.

Respectfully Submitted,

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/s/ David R. Langston

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Reagor-Dykes Amarillo, LP; Reagor-Dykes  
Auto Company, LP; Reagor-Dykes  
Plainview, LP; Reagor-Dykes Floydada, LP***

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Amended Witness and Exhibit List was served on the following parties in interest via ECF and or email on this 16<sup>th</sup> day of August 2018:

1. Reagor Dykes Auto Group  
1215 Ave. J  
Lubbock, Texas 79401
2. Keith Langley and Brandon K. Bains  
Langley LLP  
1301 Solana Blvd.  
Bldg. 1, Suite 1545  
Westlake, Tx. 76262  
Email: [klangley@l-llp.com](mailto:klangley@l-llp.com)  
Email: [bbains@l-llp.com](mailto:bbains@l-llp.com)  
***Attorneys for Ford Motor Credit***
3. United States Trustee  
Attn: Stephen McKit  
1100 Commerce Street, Room 976  
Dallas, TX 75242  
***U.S. Trustee***
4. Jason Rudd  
Wick Phillips Gould & Martin, LLP  
3131 McKinney Ave., Suite 100  
Dallas, TX 75204  
***Attorneys for Vista Bank***
5. Tommy Swann  
McCleskey, Harriger Brazill & Graf, LLP  
5010 University Ave., 5<sup>th</sup> Fl.  
Lubbock, TX 79413  
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***Attorneys for Universal Underwriters Service Corp.***

6. John Massouh  
Sprouse Shrader Smith, PLLC  
701 S. Taylor, Suite 500  
Amarillo, Tx. 79101  
Email: [john.massouh@sprouselaw.com](mailto:john.massouh@sprouselaw.com)  
***Attorneys for First Capital Bank of Texas***
7. All parties receiving notice via ECF in this case.

/s/ David R. Langston  
David R. Langston